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November 1, 2021

VIA ECF AND EMAIL

The Honorable Robert B. Kugler
United States District Court Judge
District of New Jersey
Mitchell H. Cohen Building & U.S.
Courthouse
4th & Cooper Streets, Room 1050
Camden, NJ 08101

Special Master the Honorable
Thomas Vanaskie
Stevens & Lee
1500 Market Street, East Tower
18th Floor
Philadelphia, PA 19103

Re: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*, Case No. 1:19-md-02875-RBK: Defendants' Joint Motions to Preclude the General Causation Opinions of Plaintiffs' Disclosed Experts

Dear Judge Kugler and Special Master Vanaskie:

Pursuant to CMO 23 and Federal Rule of Civil Procedure 702, please find enclosed courtesy copies of the following motions to exclude the general causation opinions of Plaintiffs' five disclosed experts and supporting materials, which are being filed today on behalf of all Defendants:

- I. Mahyar Etminan, PharmD, MSc
 - A. Notice of Defendants' Joint Motion to Exclude the Opinions of Mahyar Etminan, PharmD, MSc
 - B. Memorandum of Law in Support of Defendants' Joint Motion to Exclude the Opinions of Mahyar Etminan, PharmD, MSc

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- C. Certification of Seth A. Goldberg, Esq. attaching Exhibits A through Q
- D. [Proposed] Order Excluding the Opinions of Mahyar Etminan, PharmD, MSc

II. Stephen Hecht, Ph.D.

- A. Notice of Defendants' Joint Motion to Exclude the Opinions of Stephen Hecht, Ph.D.
- B. Notice of Defendants' Joint Motion to Exclude the Opinions of Stephen Hecht, Ph.D.
- C. Certification of Seth A. Goldberg, Esq. attaching Exhibits A through U
- D. [Proposed] Order Excluding the Opinions of Stephen Hecht, Ph.D.

III. Stephen Lagana, M.D.

- A. Notice of Defendants' Joint Motion to Exclude the Opinions of Stephen Lagana, M.D.
- B. Memorandum of Law in Support of Defendants' Joint Motion to Exclude the Opinions of Stephen Lagana, M.D.
- C. Certification of Seth A. Goldberg, Esq. attaching Exhibits A through G
- D. [Proposed] Order Excluding the Opinions of Stephen Lagana, M.D.

IV. David Madigan, Ph.D.

- A. Notice of Defendants' Joint Motion to Exclude the Opinions of David Madigan, Ph.D.
- B. Memorandum of Law in Support of Defendants' Joint Motion to Exclude the Opinions of David Madigan, Ph.D.
- C. Certification of Seth A. Goldberg, Esq. attaching Exhibits A through G
- D. [Proposed] Order Excluding the Opinions of David Madigan, Ph.D.

V. Dipak Panigraphy, M.D.

- A. Notice of Defendants' Joint Motion to Exclude the Opinions of Dipak Panigraphy, M.D.
- B. Memorandum of Law in Support of Defendants' Joint Motion to Exclude the Opinions of Dipak Panigraphy, M.D.

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- C. Certification of Seth A. Goldberg, Esq. attaching Exhibits A through I
- D. [Proposed] Order Excluding the Opinions of Dipak Panigrahy, M.D.

Please note that in the interest of efficiency, the “Factual and Procedural Background” and “Legal Standards” sections set forth in Defendants’ Joint Motion to Exclude the Opinions of Stephen Hecht, Ph.D. are applicable to all motions, and both sections are expressly incorporated by reference into the remaining four motions.

Pursuant to Local Rule 78.1, Defendants have included a request for oral argument on each of these five motions with a placeholder date from the Clerk of Court’s published calendar of motion days. As discussed at the September 29th Case Management Conference, Defendants request that the Court set a hearing for the presentation of oral argument and, where appropriate, live expert testimony on each of these motions upon the close of briefing on January 3, 2022. Given the complexity of the scientific issues at hand, Defendants believe a full hearing on these issues would benefit both the Court and the parties.

We greatly appreciate the Court’s consideration and remain available to provide any additional information that may be needed.

Respectfully submitted,

/s/ Seth A. Goldberg

Seth A. Goldberg

cc: Defendants’ Executive Committee (via email)
Plaintiffs’ Executive Committee (via email)